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May 26, 2020

VIA ELECTRONIC FILING

Ms. Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, SC 29210

Re: Docket No. 2020-106-A

Dear Ms. Boyd:

United Telephone Company of the Carolinas LLC d/b/a CenturyLink ("CenturyLink") asks for leave to file comments out-of-time in response to Commission Order No. 2020-372 in the above-referenced proceeding. Commission Order No. 2020-372 directs companies to file comments on the issues contained in the Office of Regulatory Staff Motion dated May 8, 2020 ("ORS Motion") concerning, among other things, measures to mitigate impacts of COVID-19 on utility customers and other reporting requirements. CenturyLink inadvertently missed the filing deadline related to this item in light of the carryover that occurred on May 13, 2020 and the proposed deadline in the ORS Motion for comments within 30 days of Commission order.¹ CenturyLink respectfully requests leave to file these comments out-of-time and to participate in the virtual hearing scheduled for May 27, 2020.

If permitted to make a late submission, CenturyLink respectfully submits the following in response to the ORS Motion:

CenturyLink supports the comments of Frontier Communications of the Carolinas LLC and the South Carolina Telephone Coalition filed on May 22, 2020 in this matter. As with those companies, CenturyLink is taking steps to assist customers affected by COVID-19. CenturyLink has extended its commitments under the Federal Communications Commission's Keep Americans Connected Pledge through June 30, 2020. The Pledge includes CenturyLink's commitment:

¹ Docket No. 2020-106-A, Motion to Solicit Comments from Utilities and Other Interested Stakeholders Regarding Measures to be Taken to Mitigate Impacts of COVID-19 on Utility Customers and Require Recordkeeping filed by Office of Regulatory Staff on May 8, 2020, at 6.

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- (1) not to terminate service to any residential or small business customers because of their inability to pay their bills due to the disruptions caused by the coronavirus pandemic; and
- (2) to waive any late fees that any residential or small business customers incur because of their economic circumstances related to the coronavirus pandemic.

In addition, CenturyLink has been assisting customers experiencing financial hardships due to COVID-19 to help them keep their service by, for example, establishing payment plans based on customer circumstances. CenturyLink believes these measures and the flexibility allowed by waiver of other regulations in South Carolina (such as the option for extended deferred payment plans) will provide sufficient flexibility to mitigate the effects of hardships related to COVID-19 that CenturyLink's customers may experience.

Finally, CenturyLink respectfully requests that it be exempt from any financial reporting relating to costs and savings related to COVID-19 measures. Similar to other telephone utilities, CenturyLink does not operate on a rate-of-return basis and has elected alternative regulation. Accordingly, there is not a regulatory mechanism for CenturyLink or other similarly situated telephone utilities to recover costs associated with providing consumers additional flexibility in response to COVID-19. Thus, in light of this election, CenturyLink should be exempt from financial reporting for costs and savings related to COVID-19 measures.

Please let me know if you questions.

Sincerely,

Scott Elliott

SE/lbk

cc: (All Via Electronic Mail)
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